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October 9, 2019

BY FEDEX AND ECF

The Honorable William F. Kuntz, II
United States District Court for the
Eastern District of New York
225 Cadman Plaza East
Brooklyn, NY 11201

Re: *United States v. Jean Boustani, et al. (Case No. 18-cr-681 (S-1) (WFK))*

Dear Judge Kuntz:

We represent Defendant Jean Boustani in the above-captioned matter. We are writing to respectfully request the Court's permission to allow the defense to install and use during trial the following technology equipment in Courtroom 6H N and an available breakout room to be assigned by the Court.

| Equipment: | Quantity: | Description: |
|---------------------|-----------|---|
| Widescreen monitors | 1 | Display device being used by counsel's presentation consultant. |
| Laptops | 2 | 2 laptops to present evidence for defense. |
| VGA/HDMI/Switch | n/a | Cabling to complete setup. |
| Printer | 1 | Printer for breakout room. |

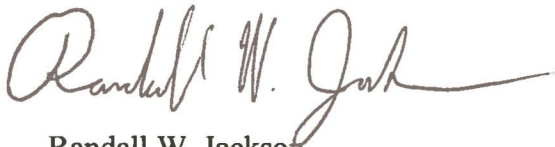
The defense further requests permission to have this equipment installed in Courtroom 6H N and an available breakout room on Friday, October 11, at 12:30 p.m., following our scheduled pretrial conference. In addition, we respectfully request permission to deliver hard copies of exhibits and other physical supplies to Courtroom 6H N during the same period of time. The installation and delivery of materials should take no more than 30 minutes.

The defense also requests the Court's approval to allow the following non-attorney members of the trial team permission to enter the courthouse with a laptop and/or cell phone for use at the trial of this matter.

| Individual: | Devices Permitted: |
|---|-------------------------|
| Raymond McLeod (DOAR Trial Consultant) | 2 laptops, 1 cell phone |
| Leslie O'Neill (DOAR Trial Consultant) | 1 laptop, 1 cell phone |
| Monica Jones (Willkie Paralegal) | 1 laptop, 1 cell phone |
| Ariana Stuart (Willkie Paralegal) | 1 laptop, 1 cell phone |

We appreciate the Court's consideration of this application. For the Court's convenience, a proposed Order is attached as Exhibit A. Thank you.

Respectfully submitted,



Randall W. Jackson
Michael S. Schachter

cc: (by ECF)

AUSA Mark E. Bini
AUSA Hiral Mehta